Forest Service Response

IDAHO FISH & GAME
CLEARWATER REGION
1540 Warner Avenue
Lewiston. Idaho 83501-5699

Dirk Kempthorne / Governor
Steven M. Huffaker / Director

September 7, 2005

Ms. Jane Cottrell
Forest Supervisor
Nez Perce National Forest
Route 2, Box 475
Grangeville, Idaho 83530

Dear Ms Cottrell:

RE: RED PINES FINAL ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to review the Final Environmental Imp act Statement for the Red Pines Project (FEIS).

Idaho Fish and Game expressed a number of concerns about this proposed sale in a letter of response to the Draft Environmental Impact Statement. Many of our concerns were addressed by the new (preferred) Alternative E that the Forest Service developed a in response to comments on the DEIS from Fish and Game, as well as other respondents. We support selection of Alternative E as the preferred alternative over the alternatives presented in the DEIS. However, even with the addition of Alternative E, a number of our concerns were not addressed or were only partially satisfied. We feel that it is appropriate to raise some of those issues again and we urge you to resolve those issues in your Decision documents.

Response 5-1. Alternative Selection. Comment Acknowledged.

In Alternative E, as with previous alternatives, the greatest proportion and the largest blocks of proposed harvest -as well as the overwhelming majority of proposed new roads -lie within relatively isolated blocks of timber that have not been previously entered in the Main Red River unit. We still believe that the proposed harvest in this block, including 991 acres of harvest and almost 8 miles of temporary road construction, is likely to have adverse impacts that outweigh potential benefit to be gained from entry. We repeat our recommendation that the Forest Service exclude the Main Red River and Trail Creek units from the harvest at this time or, at least, to further modify Red Pines harvest plans to effectively protect and manage wildlife habitat.

- We agree that portions of the Main Red River and Trail Creek stands are at risk for wildfire; however, we do not agree that fire in either of those blocks would present a substantial enough hazard to public health or property to require harvest on that basis. While we support "defensible space" projects to protect communities like Elk City, the Red Pines stands are isolated, not located near communities.. Recent aerial photography illustrates the significant harvest that has already occurred around these stands, providing an additional buffer. Because there is little risk to health or property, and because the FEIS fails to demonstrate

that impacts (or benefits) of harvest outweigh potential impacts to wildlife habitat, water quality, fish and fish habitat should wildfire occur, we recommend that you do not enter the Main Red River and Trail Creek watershed units. As before, we encourage you to make necessary modifications to your plans or designated areas so those areas can be allowed to burn should nature intervene in the future.

Response 5-2. Alternative E. treatment locations within Main Red and Trail Creek.

Lacking specifics as to what you believe are effective protective measures and management of wildlife habitats, it is difficult to address your concerns. We feel project design and mitigation measures will help curtail negative effect from propose activities.

The objective of the FEIS is to disclose effects of proposed activities, not to demonstrate that impacts of harvest outweigh potential impacts to wildlife habitat should wildfire occur.

- As we stated in our previous comments, the proposed harvest areas in the Main Red River and Trail Creek subwatershed areas are rare, fairly large, previously un-entered stands of timber. These core mature timber stands -which condition, according to the FEIS, are within the expected natural range of variability for this area - provide valuable diversity of habitat for wildlife in a landscape that has otherwise been previously, in many cases recently, very intensely logged and roaded. Past harvest in the area should provide an adequate mix of early- to mid-seral forest habitat for wildlife; however, late seral stands like the Main Red River and Trail Creek units remain under-represented in the Project area. Finally, We do not agree with your assessment that to focus of the harvest on dead and dying lodgepole pine in pole and small sizes will mitigate adverse impacts of entry on wildlife under any of the Alternatives.

Response 5-3. Alternative E treatments.
We are not proposing any activities in late seral stand in Main Red River or Trail Creek.

- The proposed harvest and road building in the Main Red River harvest area is centered over an important big game travel corridor. Specific requirements could have been, but were not, incorporated into the new Alternative to protect that habitat feature. We urge you to provide specific protections for this important habitat feature in your Decision documents.

Response 5-4. travel corridors
Big game travel corridor habitat protection.
We would like to consider any specific requirements you believe would address your concerns, however, you did not provide any specific requirements for consideration. Lacking any suggested requirements, existing project design and mitigation measures will be retained.

- Similarly, both Main Red River and Trail Creek treatments will have adverse impacts on moose winter habitat. Alternative E retains three units in moose winter range, with treatments that will remove from 50-80% canopy. Pacific yew is a vegetative component of those treatment units. IDFG wildlife biologists identify Pacific yew as a critical component of moose winter habitat in north Idaho.

  As did the DEIS, the FEIS (FElS Page 2-18) "recognizes treatments in moose winter range" and identifies project design measures (#30, 31, 32, 33) intended to minimize impacts to moose winter range. IDFG does not view these measures as adequate; they are both inadequate and discretionary. We would prefer that all harvest treatments in moose winter range be eliminated to avoid both direct impact to critical habitat as well as indirect impacts from disturbance. At a minimum, the project design measures should be amended to include special measures to avoid any impacts to critical Pacific yew habitat. We recommend that harvest and harvest-related activities should be precluded in those areas where a Pacific yew component is present, and that a suitable buffer be retained around those areas to provide adequate hiding cover and minimize disturbance. This would mean, of course, that slash piling, yarding and similar activities would not be allowed where Pacific yew is present. We also recommend timing of treatment activities to avoid disturbance to wintering moose and elk.

Response 5-5. Moose winter range habitat. Yew.
We acknowledge there will be negative effects in treated areas in moose winter range. We have tried to design the project to reduce those negative effects. The selected alternative, Alternative E-Modified, will treat moose winter range with design measures 30, 31, 32, and 33.

Design measure #37 includes yearlong access restriction on new temporary roads to maintain habitat security in moose winter range, including recreational use of contractors implementing the project. This design measures was modified to include no winter harvesting in moose and elk winter range (including MA 21). Fuels reduction activities in these units will be limited to the summer and fall seasons to avoid disturbance to wintering animals.

Design measure #38 was strengthened to include yearlong access restriction to all motorized vehicles (except those used to implement and administer the project) from time of construction to time of decommissioning. All temporary roads will be decommissioned within 3 years of use.

In our response both to the Scoping Notice and to the DEIS for the Red Pines Project, we expressed concerns about the potential impacts of the Red Pines project on water quality and fish habitat in Red River. We were particularly disturbed by the long-term or permanent degradation

of water quality and fisheries that was predicted for some sub-watersheds in the DEIS as a result of the proposed action. Our concerns about water quality and aquatic habitat have been largely addressed in the FEIS and by the development of Alternative E. The FEIS provides details about stream restoration, road decomissioning and other watershed improvements that were lacking in the DEIS. More importantly, the new preferred Alternative E specifies modified harvest prescriptions, stream restoration and road decommissioning actions that are not expected to result in long-term or permanent degradation of water quality and fisheries. If the predictive models used to analyze the action prove correct, Alternative E may, in fact, provide the long- term improvements to water quality and aquatic habitat in the Red River watershed.

Response 5-6. Water quality and aquatic habitat, Alternative E.
Alternative E was designed to result in an upward trend in all Red River subwatersheds potentially affected by fuel treatment activities. Fuel treatment activities are not proposed in every subwatershed in Red River. Watershed restoration activities are not proposed in every subwatershed in Red River. Watershed restoration activities are, however, proposed in the same watersheds where fuel treatments would occur, and in some subwatersheds where fuel treatments are not proposed. This complies with upward trend direction in the Forest Plan. Proposed watershed restoration activities are summarized by subwatershed and presented in the Red Pines FEIS starting on page H-32.

In our earlier comments, IDFG recommended that the effectiveness-monitoring plan for the Red Pines Project be enhanced considerably. Scarcity of post-project monitoring data is one of the primary reasons it is so difficult to predict and communicate the environmental effects and potential benefits of projects like Red Pines on water quality and habitat. In response to our suggestion, we were informed that the South Fork

Response 5-7. Effectiveness Monitoring, TMDL.
Add ional monitoring has been included from the Biological Opinions received from U.S. Fish and Wildlife Service and NOAA-Fisheries. See ROD Appendix B. The Forest Service is actively participating on the Watershed Advisory Group for the on the South Fork Clearwater River TMDL and the Implementation Plan which includes monitoring activities.

Clearwater TMDL monitoring program (yet to be developed), and the previously-described monitoring sites will provide adequate data to monitor and assess impacts and anticipated improvements from the Red Pines project. Although current monitoring stations and, perhaps, future TMDL monitoring will provide some insights into the project impacts, we still believe that at least one long-term monitoring station should be installed at the most downstream point in Red River within the Project area. Discharge, suspended sediment, bedload sediment, conductivity and stream temperature should be measured on a continuing basis. Ideally, additional monitoring stations would also be established at several points upstream so impacts from various phases of the proposed project could be monitored long-term.

(Continued) We don't have any plans for a TMDL monitoring station in Red River. The sediment TMDL was written for the mainstem South Fork Clearwater. We're in process of setting up TMDL monitoring stations along the mainstem South Fork. Three monitoring stations have been established and sampled since April (2006) for suspended and bedload sediment. Five stations for substrate condition and channel morphology will be established in August 2006. One of these will be in the reach from Crooked River to the confluence of Red and American Rivers. Initial site selection places a monitoring station about 1.5 miles downstream of the mouth of Red River. Within Red River, we plan to use the existing BLM monitoring station at River Mile 0.1 to track condition and trend near the mouth. See the also the TMDL Implementation Plan Appendix B - Sediment Monitoring Plan, US Forest Service. (http://www.deq.state.id.us/water/data_reports/surface_water/tmdls/clearwater_river_sf/clearwater_river_sf_plan.pdf).

(Please note, however, that IDFG does not monitor water quality on the Red River WMA. A University of Idaho annual monitoring project on the WMA includes stream morphology, sediment size and embeddedhess and various other physical parameters. No water quality parameters are routinely monitored on the WMA, though some temperature data is available.

IDFG appreciates the Forest Service's attentiveness to the comments and concerns that we and others raised regarding the DEIS. We realize that developing a new Alternative to respond to concerns was no small effort and sincerely appreciate your responsiveness.

Thank you again for the opportunity to comment on the Red Pines Project.

Sincerely,

/s/ Cal Groen
Cal Groen
Clearwater Regional Supervisor

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c: Tracey Trent

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Regarding the water temperature TMDL, we have canopy density and shade targets that apply in Red River and other tributaries to the South Fork. We're not proposing to establish fixed monitoring stations to track compliance, but rather to do that on a project basis, by documenting what we have implemented and how it contributes to canopy density or shade targets. A similar approach would be used for unplanned events, such as wildfire.

Response 5-8. Monitoring correction.
Thank you for this clarification.